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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Harry Albert DeBari
Dba DeBari Discovery Group
Debtor

| Case No: 21-12424-elf

| Chapter 13

| Judge: Eric L. Frank

| Hearing Date: May 10, 2022 1:00PM

Objection Deadline: April 19, 2022 2022

ANSWER TO TRUSTEE'S MOTION TO DISMISS

I, the Respondent, Harry A. DeBari, as and for my Answer to the Complaint, state as follows:

1. There has been no unreasonable delay by debtor that is prejudicial to creditors pursuant to 11 U.S.C. Section 1307(c)(1). Therefore, I deny the allegation.
2. Debator has not failed to commence making timely payments to the trustee as required by 11 U.S.C. Section 1326. Therefore, I deny the allegation.

DATED THIS 19TH OF APRIL, 2022



HARRY A. DEBARI

Clerk, U.S. Bankruptcy Court
Philadelphia, PA

DOCKET 21-12424-ELF
04/24/2021 PA 18002
Helen DeBartolo